

FILED

JAN - 9 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

In Re DMCA Subpoena to Reddit, Inc.

CV 19 80 005 MISC

Case No.

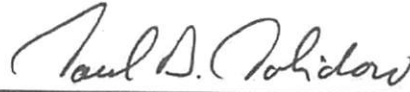
SK

: Declaration of Paul D. Polidoro in
 : Support of Watch Tower Bible
 : and Tract Society's Request to the
 : Clerk for Issuance of Subpoena to
 : Reddit, Inc., Pursuant to 17 U.S.C.
 : § 512(h) to Identify Alleged
 : Infringer
 : X

PAUL D. POLIDORO, counsel of record for Petitioner Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") in the above-referenced matter, hereby declares as follows:

1. I am authorized to act on behalf of Watch Tower.
2. I submit this declaration in support of Watch Tower's request for issuance to Reddit, Inc. of a subpoena, pursuant to the Digital Millennium Copyright Act ("DMCA") 17 U.S.C. § 512(h) (hereinafter "DMCA Subpoena"), to identify the user identified as: "u/darkspilver".
3. Pursuant to 17 U.S.C. § 512 (c)(3)(A), Watch Tower submitted a notification to Reddit, Inc. identifying the infringing content posted by the aforementioned user and providing the information required by 17 U.S.C. § 512 (c)(3)(A). A true and accurate copy of the submitted notification is attached hereto as Exhibit 1.
4. The purpose for which this DMCA Subpoena is sought is to obtain the identity of an alleged infringer or infringers and such information will only be used for the purpose of protecting Watch Tower's rights under title 17 U.S.C. §§ 100, *et. seq.*

I declare under penalty of perjury under the laws the United States of America that the foregoing is true and correct. Executed this 19th day of December 2018.



Paul D. Polidoro
Associate General Counsel
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA
Legal Department
100 Watchtower Drive
Patterson, NY 12563
Telephone: 845-306-1000
Facsimile: 845-306-0709
Email: inboxLGLipg@jw.org
(*pro hac vice* pending)

EXHIBIT “1”

From: InboxLGLIPG
Sent: Wednesday, December 19, 2018 11:19 AM
To: 'copyright@reddit.com'
Subject: Notice of Infringement by: u/darkspilver

Dear Sir/Madam:

I represent Watch Tower Bible and Tract Society of Pennsylvania ("Watch Tower"). It has come to our attention that you are reproducing and distributing Watch Tower's intellectual property illegally and without authorization.

Below is the information needed for you to identify the unauthorized display of Watch Tower's intellectual property.

Name of Infringing User: u/darkspilver

Title Given to Infringing Material (if any):	Link to Infringing Material:	Title of Work Being Infringed (if applicable):	Link to Lawful Display of Material(s) on Watch Tower's site:
WHAT GIFT CAN WE GIVE TO JEHOVAH?" WT Magazine NOVEMBER 2018, Full Back page	https://www.reddit.com/r/exjw/comments/943s0v/what_gift_can_we_give_to_jehovah_guess_what_wt/	What Gift Can We Give Jehovah?	https://www.jw.org/en/publications/magazines/watchtower-study-november-2018/gift-we-can-give-to-jehovah/
WHAT GIFT CAN WE GIVE TO JEHOVAH?" WT Magazine NOVEMBER 2018, Full Back page	https://i.redd.it/sqkb8jmv5rd11.png	What Gift Can We Give Jehovah?	https://www.jw.org/en/publications/magazines/watchtower-study-november-2018/gift-we-can-give-to-jehovah/
Congregation Record of Processing Activities - Europe GDPR	https://www.reddit.com/r/exjw/comments/8vr7ls/congregation_record_of_processing_activities/	C-5829Ca	Not publicly available
Congregation Record of Processing Activities - Europe GDPR	https://i.redd.it/oauph4mmp711.png	C-5829Ca	Not publicly available

We hereby request that you take all steps necessary to immediately remove the infringing materials from your website. Advise us in writing within ten (10) days of the date of this letter whether or not you will take the requested action.

I have a good faith belief that use of the materials in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I hereby state under penalty of perjury that this information is accurate, and that I am authorized to act on behalf of the owner of the infringed materials.

Sincere

Philip Brumley

Philip Brumley
General Counsel

Intellectual Property Owner: Watch Tower Bible and Tract Society of Pennsylvania

Company: Watch Tower Bible and Tract Society of Pennsylvania

Address: 100 Watchtower Drive

City, State, and Zip: Patterson, NY 12563

Name and Title: Philip Brumley, General Counsel

Attorney Address: 100 Watchtower Drive, Patterson, NY 12563

Email Address: InboxLGLCopyright@jw.org

Telephone: 845-306-1000